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25 October 1983

US EPA RECORDS CENTER REGION 5



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Kathleen Martin
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4344 IDS Center
80 South Eighth Street
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Michael J. Wahoske
Dorsey & Whitney
2200 First Bank Place East
Minneapolis, Minnesota 55402

RE: U.S. v. Reilly Tar & Chemical Corporation
File No. Civ. 4-80-469
Deposition of Mr. John Aho


Dear Mr. Wahoske and Ms. Martin:

Earlier today I telephoned Mr. Wahoske to discuss two matters relating to the deposition of Mr. John Aho, scheduled to begin at 9:30 a.m. on October 28, 1983.

First, our office has just become aware of the existence of notes made and kept by Mr. Aho. These notes have not been previously produced by the State. I called Mr. Wahoske to inform him of this fact and to suggest that we provide him with a copy of the notes tomorrow (Wednesday, October 26, 1983.) Mr. Wahoske stated that, subject to his further review, such production would be acceptable. Accordingly, I am enclosing with this letter a copy of the documents identified by the stamped numbers 9605082 - 9605102.

Second, Mr. Wahoske and I discussed the Magistrate's Order regarding disclosure of documents reviewed by a witness but not bearing that witness' name. I suggested that we include with the Wednesday production a copy of any such documents. Mr. Wahoske agreed to this. Therefore, you also will find enclosed with this letter a copy of a document identified by the somewhat illigible stamped number 3000044.

Very truly yours,


Lisa R. Tiegel
Special Assistant
Attorney General

LRT:lt
Enclosure
cc: All Counsel (without enc.)